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Planning Department
Merthyr Tydfil County Borough Council
Unit 5, Triangle Business Park
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Dear Sir / Madam

Re: Land at 40 Mount Pleasant, Heolgerrig, Merthr Tydfil

I write with regard to a planning application submitted on behalf of Mr J. Slocombe (the applicant) to Merthyr Tydfil County Borough Council (MTCBC) for a replacement dwelling on land at 40 Mount Pleasant, Heolgerrig (hereafter referred to as 'The Site'). The proposal includes the demolition of the existing dwelling, the creation of additional off-street parking provision, landscaping and associated works.

This document provides a full assessment of the acceptability of the proposed development from a planning perspective in relation to local and national planning policy, as well as all other material planning considerations.

1.0. Site Context

- 1.1 The Site consists of an existing flat roofed single storey detached dwelling set within its own curtilage. The existing dwellings footprint is roughly square with a single storey extension to

the north west corner. The dwelling benefits from a garden area to the north and south, as well as a detached single garage located in the south-west corner of the curtilage.

- 1.2 The boundaries of the Site are defined by existing well maintained hedgerows along the northern, eastern and western extents of the Site, and a wall/timber fencing along the southern boundary. The existing property is set above road level and the Site rises gently from east to west. The Site is also bounded by highways along its western and eastern boundaries, with residential properties located to the south. To the north of the Site is a triangular parcel of land occupied by a detached garage structure and hedgerows.
- 1.3 The area surrounding the application site is made up almost entirely of existing residential dwellings. What is distinctive about the surrounding area is the degree in the variation of housetypes in terms of their scale, design and materials. Indeed, the area surrounding the Site benefits from little or no uniformity in terms of built form whatsoever. It is against this varied context the application proposal should be assessed. The location of the site is shown below at Figure 1.



Figure 1 – Site location and layout plan

2.0 Relevant planning history

- 2.1 Whilst there are no recent planning application of relevance to the application proposal, the applicant did submit a formal planning pre-application enquiry in relation to a replacement dwelling at the site under Local Planning Authority reference PA/25/0007. Whilst some concerns were raised in relation to the scheme submitted as part of that enquiry, the officer was generally supportive of the principle of a replacement dwelling at the site.

3.0 Planning Policy

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the development plan unless material considerations indicate otherwise. At national level the relevant policy is Future Wales, Planning Policy Wales and supporting Technical Advice Notes. The statutory local development plan for this Site is the Caerphilly County Borough (CCBC) LDP up to 2021, which was adopted in 2010.

National Planning Policy

Future Wales: The National Plan 2040

- 3.2 Adopted by the Welsh Government in February 2021, *Future Wales: The National Plan 2040* (hereafter referred to as *Future Wales*) sets out strategic land use planning policies to address national priorities. These include fostering a strong economy, directing growth to appropriate areas, achieving decarbonisation and climate resilience, strengthening ecosystems, and enhancing community health and well-being.

The key policies within *Future Wales* relevant to this site and its development are:

- **Policy 1: Where Will Wales Grow** – Identifies National and Regional Growth Areas where new development should be focused. One such National Growth Area is the Cardiff, Newport, and Valleys urban cluster, which includes the development site.
- **Policy 2: Shaping Urban Growth and Regeneration** – Emphasizes that urban growth and regeneration should contribute to sustainable, compact, and walkable communities with mixed-use centres, accessible public transport, and integrated green infrastructure.
- **Policy 9: Resilient Ecological Networks and Green Infrastructure** – Aims to enhance biodiversity, ecosystem resilience, and green infrastructure by safeguarding key areas, improving existing assets, and creating new green spaces. Connecting designated or high-value sites through green infrastructure improvements is also encouraged.
- **Policy 11: National Connectivity** – Supports national connectivity improvements by prioritizing longer-distance travel via public transport and promoting the use of electric vehicles.

- **Policy 12: Regional Connectivity** – Encourages a shift away from private car use by promoting active travel and public transport alternatives.
- **Policy 17: Renewable and Low Carbon Energy** – Strongly supports the development of renewable and low-carbon energy projects across all technologies and scales to meet Wales's future energy needs.
- **Policy 33: National Growth Area – Cardiff, Newport, and the Valleys** – Provides further details on growth aspirations within this designated National Growth Area, reaffirming The Site's inclusion within this strategic zone.

Planning Policy Wales, 12th Edition

3.3 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015. The key planning principles are set out in this document are, amongst other things:

- A plan-led approach is the most effective way to secure sustainable development through the planning system, i.e., decisions should be made in accordance with Local Development Plans
- Making the best use of resources
- Creating and sustaining communities
- Maximizing environment protection and limiting environment impact
- Consideration of the Transport Hierarchy

Technical Advice Notes

3.4 Technical Advice Notes (hereafter referred to as TANs) should be considered by local planning authorities when they are preparing development plans and should be read along with the Planning Policy Wales document which sets out land use planning policies in Wales. The relevant TANs are:

- TAN 5: Nature Conservation and Planning (2009)
- TAN 12: Design (2016)
- TAN 16: Transport (2007)

Caerphilly CBC Local Development Plan up to 2021

3.5 The Merthyr Tydfil CBC Local Development Plan covers the period from 2016 to 2031 and was adopted on 29th January 2020.

3.6 On the LDP Proposals Map (see Figure 2 below) the Site lies entirely within the settlement of Heolgerrig and located immediately adjacent to a Proposed Active Travel Integrated Network Map route (in accordance with Policy SW12 of the adopted LDP), which adds to the sustainability credentials of the Site.

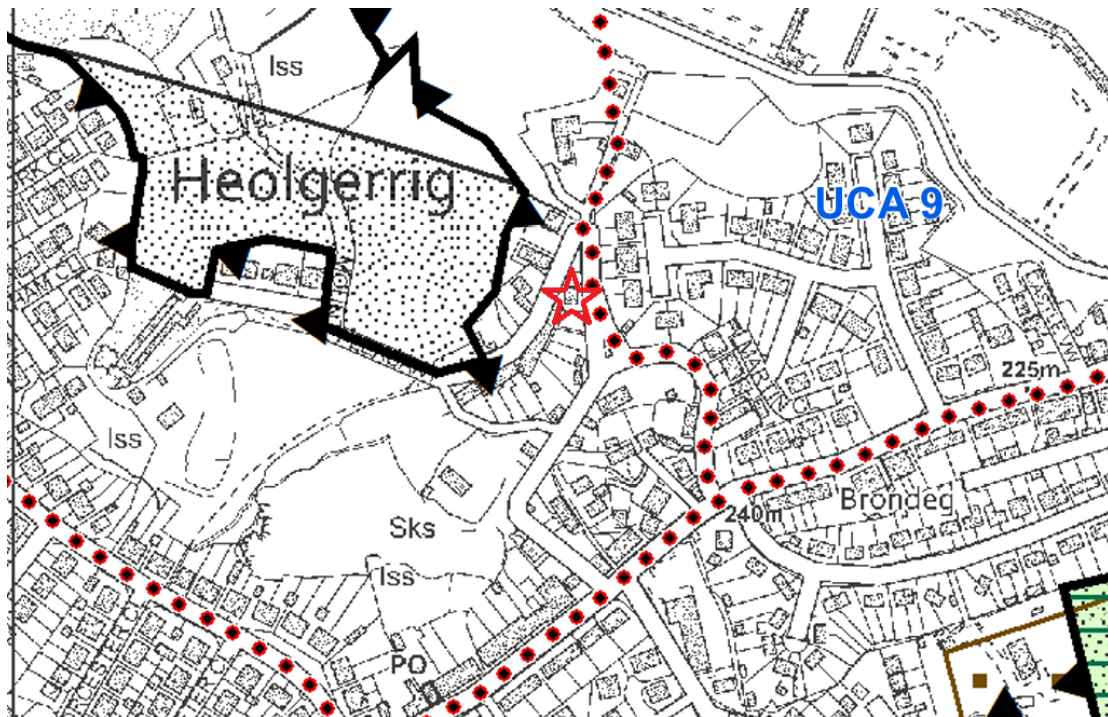


Figure 2: Local Development Proposals Map Extract

3.7 The LDP policies which are relevant to this planning appraisal are listed below:

- Policy SW3 – Sustainably distributing new homes
- Policy SW4 – Settlement Boundaries
- Policy SW11 – Sustainable design & Placemaking
- Policy EnW1 – Nature Conservation and ecosystem resilience

Supplementary Planning Guidance

3.8 Supplementary Planning Guidance provide additional guidance and detail to supplement the policies contained within the LDP policies. The relevant Supplementary Planning Guidance documents to the proposed development at the Site are:

- SPG Note 5: Nature and Development (May 2015)
- SPG Note 6: A design guide for Householder Development

Other Relevant Legislation

Well-being of Future Generations (Wales) Act 2015

3.9 The Well-being of Future Generations Act places a duty on public bodies to carry out sustainable development. The Act requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural.

Flood and Water Management Act 2010

- 3.10 Flood and Water Management Act 2010 (FWMA) requires surface water drainage for new developments which are over 100m² to comply with mandatory National Standards for Sustainable Drainage and developments obtain consent from the relevant require SuDS Approving Body (SAB).

4.0 Planning Assessment

Principle of Development/Proposed Land Use

- 4.1 Policy SW4 defines settlement boundaries within which development is permitted in principle. The application site and proposed development is located entirely within the defined settlement boundary, and therefore the principle of development is acceptable in principle subject to material planning considerations.
- 4.2 The Site is classed as brownfield land in planning terms, and the use of the Site for residential purposes is already established by virtue of the existing dwelling at the Site. The proposed use falls within Use Class C3 and given its position within the existing settlement of Tregarraig, will support the function of the settlement, whilst creating a new family home in place of a clearly dilapidated existing structure.

Design

- 4.3 LDP Policy SW11 relates to Sustainable Design and Placemaking, and outlines that development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. It states that where appropriate new development will be require to:
1. *be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density;*
 2. *integrate effectively with adjacent spaces, the public realm and historic environment to enhance the general street scene and create good quality townscape;*
 3. *not result in an unacceptable impact on local amenity, loss of light or privacy, or visual impact, and incorporate a good standard of landscape design;*
 4. *contribute to the provision of green infrastructure, including open space in accordance with the Council's standards, sustainable drainage systems where appropriate, and ensure that the County Borough's network of green infrastructure is accessible and connected;*
 5. *allow access for the widest range of people possible, and demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council's parking standards;*
 6. *incorporate a range of inclusive/adaptable design specifications, a mix of house types, tenures and sizes to meet identified local needs;*
 7. *incorporate resource efficient/adaptable buildings and layouts using sustainable design and construction techniques;*
 8. *minimise the demand for energy and utilise renewable energy resources;*
 9. *provide and protect relevant utility services and infrastructure without causing any unacceptable environmental impacts;*
 10. *incorporate measures to improve ground and surface water quality wherever possible;*
 11. *provide adequate facilities and space for waste collections and recycling; and*

12. promote the creation of healthy and active environments and reduce the opportunity for crime and anti-social behaviour.

- 4.4 It is clear from the LPA's pre-application response (Ref: PA/25/0007), that the main concerns of the case officer related to the scale (particularly height) of the dwelling submitted as part of the pre-app, and its potential impact on the surrounding area by virtue of its scale. Furthermore, the planning officer was concerned about the potential impact of the development on the amenity of nearby residential properties, particularly with regard to an overbearing, and potential overlooking impact.
- 4.5 As can be seen from the submitted elevation, amendments to the proposed scheme have been undertaken in order to seek to address the concerns of the case officer. Firstly, the finished floor level has been reduced by 1.02m. Furthermore, the eaves level and resultant ridge level have been reduced by 1.35m. These elements will ensure the proposed dwelling sits lower within the application site thereby reducing the overall impact of the massing.
- 4.6 Further design changes to address the concerns of the planning officer also include adjusting the pitch of the front facing gable element. The pitch has been increased to ensure it occupies more of the roof plane on the front elevation, thereby improving the proportions of the gable element, and reducing the overall massing of the roof plane. Another amendment from the pre-application scheme is the introduction of further openings in the rear elevation to add architectural interest when viewed from the highway that runs along the western boundary of the Site. This proposed elevations are shown below at Figure 3 and should be read in conjunction with the pre-application submission.



Figure 3 – Proposed elevations as amended from the pre-application submission

- 4.7 The materials palette for the building has been carefully considered to ensure a high quality dwelling at the Site. The proposed materials include natural stone work cladding, smooth white render, natural

timber cladding, pre-cast concrete/stone cills, and modern roof tiles. These materials, coupled with the high quality design of the proposed dwelling, will significantly improve the dwelling at the Site, and the resultant aesthetic of the surrounding area. At present, the existing dwelling is of extremely low architectural value and has an overall negative impact on the surrounding streetscene. The proposal represents the opportunity for a significant improvement in this regard.

- 4.8 The proposed development also includes a parking area for up to 3no. cars, as well as a refuse storage in accordance with the adopted car parking standards.

Residential Amenity

- 4.9 LDP Policy SW11 (Criterion 3) also relates to impact on residential amenity. As can be seen below at Figure 4 and 5, the proposed dwelling has been sited within the application site an appropriate distance off the boundary with No. 41 Mount Pleasant to ensure it does not result in an unacceptable overbearing impact. No. 41 does not appear to have any ground floor habitable rooms near the boundary with the application site, and benefits from a relatively wide rear garden with open outlook. Furthermore, as the proposed dwelling is located to the north of No. 40 and its rear garden, the development will have no overshadowing impact.



Figure 4 – Relationship of proposed dwelling to No. 40 Mount Pleasant

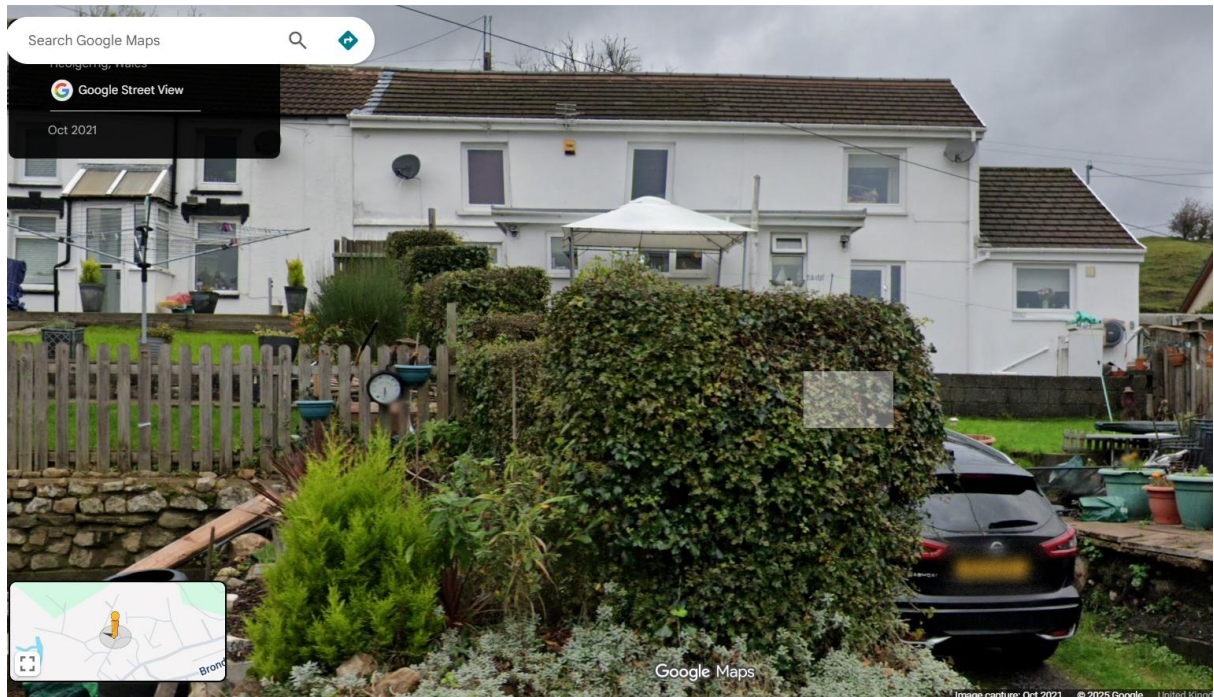


Figure 5 – Photograph of rear elevation and garden on No. 41 Mount Pleasant (Source: Google Streetview)

- 4.10 A concern of the planning case officer in relation to the pre-application submission was the potential overbearing impact of the proposed dwelling on the rear garden of No. 41. However, for the reasons outlined above, coupled with the position of the proposed dwelling at a lower level than No. 41, it is contended that the proposal would not result in an overbearing impact to a degree to warrant a refusal of planning permission. The levels relationship between the existing proposed properties is shown below at Figure 6.



PROPOSED STREET SCENE

- LOOKING WEST FROM MOUNT PLEASANT AT THE PROPOSED FRONT ELEVATION

Figure 6 – Plan showing levels relationship of proposed dwelling to No. 41 Mount Pleasant

- 4.11 In terms of privacy, on the basis that the windows in the proposed south elevation are obscurely glazed, as well as the height and position of boundary treatments along the southern boundary, the

proposed dwelling will not have an unacceptable impact on the privacy of No. 40 or any other existing dwellings.

Amenity space / Public open space

- 4.12 As can be seen above at Figure 4, the Site would benefit from a reasonably sized area of private amenity space to the south of the proposed dwelling. This area is flat and accessed directly via the patio doors to the proposed south elevation.

Sustainability

- 4.13 The underpinning principle of PPW12 is the requirement for sustainable development in Wales through, amongst other things, sustainably located development and energy efficient development. This is supported by LDP Policy SW11 which seeks to promote sustainable development. Furthermore, the proposed development would be built to current building regulations that would result in a replacement dwelling with far greater energy efficiency than the existing dwelling.

Flood Risk

- 4.14 Technical Advice Note 15 (TAN-15), first introduced by the Welsh Government in 2004 and last updated in March 2025, provides detailed guidance on development planning and flood risk management in Wales. It establishes a framework for assessing flood risks from rivers, the sea, surface water, and coastal erosion. The latest update to TAN-15 shows that the Site is flood free in terms of fluvial and surface water flood risk.

Biodiversity

- 4.15 The Site is not located within or adjacent to a designated site of importance from an ecological perspective. However, as the proposed includes the demolition of the existing structure, a Preliminary Ecological Appraisal (PEA) of the site to include a Preliminary Roost Assessment (PRA) was requested as part of the pre-application response. This has been undertaken, and includes an activity survey on the advice of the consultant ecology based on the roost potential of the existing structure. These ecological surveys have been submitted along with the application, but in summary confirm the building is not suitable for bats and is not being utilised by bats for roosting. This assessment was based on an initial bat inspection survey and subsequent emergence survey as detailed in the accompanying report.

Trees and Landscaping

- 4.16 Policy CW6 protects trees, woodland and hedgerows owing to their amenity value and possible biodiversity value. Whilst the site is bounded by existing hedgerows, these will be retained and enhanced as part of the proposed development. Furthermore, the Site contains no trees, and therefore a tree survey is not required.

Highway Safety and Car Parking Provision

- 4.17 The proposed driveway access located to the north of the proposed dwelling will be accessed directly off Mount Pleasant to the east of the Site. This highway is lightly trafficked and access and egress onto this highway is acceptable from a safety perspective subject to boundary treatments being kept to an appropriate height within the required visibility splays.
- 4.18 In terms of off-road parking to serve the proposed 4no. bedroom development, it should be noted that the existing 2no. bedroom property benefits from 1no. off-road car parking space in the existing garage located in the south-west corner of the site. On the basis that the application proposes to increase the number of bedrooms from 2 to 4, the provision of 2no. additional spaces within the site should be deemed acceptable from a car parking perspective.

Community Infrastructure Levy (CIL)

- 4.19 On the basis that the existing dwelling has been used for its lawful purpose, i.e.C3 dwellinghouse, for a continuous period of 6 months in the 3 years prior to the planning application, this result in the development not being liable for CIL.

5.0 PRE-APPLICATION PLANNING ENQUIRY AND AMENDMENTS MADE TO CURRENT PLANNING APPLICATION AND PROVISION OF ADDITIONAL INFORMATION

Pre-Application Planning Enquiry PA/25/0007

- 5.1 A formal pre-application enquiry in relation to a replacement dwelling at the Site was submitted to the Local Planning Authority in the spring of 2025 and a formal response was received on 29th April 2025.
- 5.2 The response from the LPA supported the principle of the development on the basis the site is brownfield and located within the settlement boundary whereby the principle of development is acceptable subject to material planning considerations.
- 5.3 The response raised concerns in terms of the bulk and ridge height of the proposed dwelling, and the potential for it to appear as an overly dominant, discordant features within its surroundings. As outlined above at paragraphs 4.4 – 4.6, the finished floor level and eaves/ridge level of the submitted scheme have been reduced by over a metre compared to the pre-application submission. This reduction in overall height represents a significant amendment that will reduce the overall impact of the dwelling. Furthermore, the front gable element has been amended to reduce the perceived massing of the roof plane on the front elevation.
- 5.4 It should also be noted that the properties to the south and west of the application site, against which the proposed dwelling would be read in visual terms, are located at a higher level, thereby ensuring the proposed dwelling appears appropriate from a surrounding topography perspective. At present the current dwelling is unusual by virtue of its diminutive scale and poor architectural features. The

proposed dwelling would represents a significant improvement in visual terms, that, given the levels adjustments outlined above, would not be over dominant within its setting.

- 5.5 The massing of the proposed development would also be less significant that the two dimensional elevational plans suggest with the majority of the roof massing falling away from the highways that bound the site to the east and west.
- 5.6 Concern were also raised about the lack of elevational detailing on the rear elevation, potential overbearing impacts, the potential loss of privacy, as well as parking provision. These issues are appropriate addressed above within Section 4 of this planning statement.
- 5.7 In terms of the additional information requested in the pre-application response, this application is accompanied by a Coal Mining Risk Assessment (CMRA), Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) which includes an activity survey for bats. A Green Infrastructure Statement has also been prepared that demonstrates the proposed development will deliver overall biodiversity net gain.
- 5.8 Based on the above, along with the technical survey work and updated details that accompany the application, it is considered that the concerns outlined by the LPA in the pre-application enquiry response have been overcome and on that basis it is respectfully requested that the application is approved.

Kind regards

Chris Boardman (Agent)
Boardman Planning Ltd.